

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TONY KOLE, *et al.*,

Plaintiffs,

v.

VILLAGE OF NORRIDGE,

Defendants.

No. 11-CV-03871

Hon. Judge Thomas M. Durkin
U.S. District Judge

Hon. Morton Denlow
U.S. Magistrate Judge

**AGREED MOTION TO EXTEND TIME FOR
DEFENDANT TO ANSWER OR OTHERWISE PLEAD IN RESPONSE TO
PLAINTIFFS' SECOND AMENDED COMPLAINT**

Defendant, the Village of Norridge, by its counsel Ancel, Glink, Diamond, Bush, DiCianni & Krafthefer, P.C., and by agreement with counsel for the Plaintiffs, hereby move for an extension of time to answer or otherwise plead to Plaintiffs' Second Amended Complaint, pursuant to Federal Rule of Civil Procedure 6(b)(1). In support of this motion, Defendant states as follows:

1. Plaintiffs were granted leave to file their Second Amended Complaint on July 24, 2013. The Village was allowed to August 14, 2013 to answer or otherwise plead.
2. Drafting a pleading responsive to Plaintiffs' Second Amended Complaint requires careful comparison to Plaintiffs' prior complaint, and analysis of the Court's 56-page memorandum, opinion, and order addressing Plaintiffs' 24 prior claims. (Order, Apr. 19, 2013).
3. Plaintiffs' Second Amended Complaint contains two entirely new claims, requiring additional research and analysis not required in response to Plaintiffs' prior complaints.
4. Counsel primarily responsible for drafting the Village's answer or other pleading, Daniel J. Bolin, has worked diligently on the Village's responsive pleading, but has also been

occupied with land use applications in Ogle County and Winnebago County, a campaign finance hearing before the Illinois State Board of Elections, and a motion for summary judgment in the Circuit Court of Cook County.

5. Therefore, the Village seeks additional time to answer or otherwise plead, to August 28, 2013.

6. This motion is made by agreement with the Plaintiffs. Defendants' counsel attempted to file a motion to extend time on August 14, 2013, but was unable to do so due to technical difficulties.

7. This motion is made in good faith and is not intended to unduly delay these proceedings.

WHEREFORE, Defendant Village of Norridge respectfully requests that this Court grants its motion to extend time to answer or otherwise plead to August 28, 2013.

Respectfully submitted:

By: /s/ Daniel J. Bolin
One of Defendants attorneys

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